

**Request No. 39:**

- 39 All documents relating to LOAs received from and/or submitted on behalf all NOS, Affinity and/or NOSVA current and/or former customers relating to the provision of service by NOS, Affinity and/or NOSVA on a temporary basis and/or for a temporary period of time.

**Objections and Response to Request No. 39:**

The Companies hereby incorporate their General Objections to the extent applicable.

Subject to, and without waiving their objections, the Companies respond as follows:

Without waiving said objections, responsive material is produced.

**Request No. 40:**

- 40 All documents relating to the discharge of all NOS, Affinity, and/or NOSVA employees and/or agents who were discharged for reasons related to their winback-related activities on behalf of NOS, Affinity and/or NOSVA.

**Objections and Response to Request No. 40:**

The Companies hereby incorporate their General Objections to the extent applicable.

Subject to, and without waiving their objections, the Companies respond as follows.

Without waiving said objections, responsive material is produced.

**Request No. 41:**

41. All documents relating to the relocation or proposed, planned and/or contemplated relocation of any or all NOS, Affinity and/or NOSVA facilities, offices, and/or operations to Nevada or to a location or locations elsewhere

**Objections and Response to Request No. 41:**

The Companies hereby incorporate their General Objections to the extent applicable.

Subject to, and without waiving their objections, the Companies respond as follows:

Objection. To the extent such documents may exist and are not privileged, the

Companies object that such documents are not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

### **RESERVATION OF RIGHTS**

The Companies' investigation of the facts and circumstances surrounding the matters identified by the Enforcement Bureau is ongoing. These Objections and Responses are based on currently available information. The Companies reserve the right to supplement and/or amend

these Objections and Responses at a later time if additional information is discovered during the course of future investigation.

Respectfully submitted,

Counsel for

Affinity Network, Inc  
NOSVA Limited Partnership

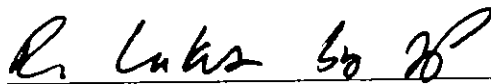


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July 29, 2003

\* Licensed in the District of Columbia.

\*\* Licensed in Maryland and the District of Columbia.

## CERTIFICATE OF SERVICE


Alice Burress, certifies that she has, on this 29<sup>th</sup> day of July, 2003, except where noted, sent by first class United States mail copies of the foregoing a copy of the foregoing "Joint Objections and Responses to Enforcement Bureau's First Request to Enforcement Bureau's First Request for Production of Documents" to

Honorable Arthur I. Steinberg  
Administrative Law Judge  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Rm 1-C861  
Washington, D.C. 20554  
(By Hand Delivery)

Hillary DeNigro  
Investigations & Hearings Division  
Enforcement Bureau  
Suite 3-B443  
Federal Communications Commission  
445 12th Street S.W.  
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